

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DONALD J. TRUMP, DONALD J. TRUMP  
JR., ERIC TRUMP, IVANKA TRUMP,

and

THE DONALD J. TRUMP REVOCABLE  
TRUST, THE TRUMP ORGANIZATION,  
INC., TRUMP ORGANIZATION LLC, DJT  
HOLDINGS LLC, DJT HOLDINGS  
MANAGING MEMBER LLC, TRUMP  
ACQUISITION LLC, and TRUMP  
ACQUISITION, CORP.,

Plaintiffs,

- against -

DEUTSCHE BANK AG,

Defendant,

and

COMMITTEE ON FINANCIAL SERVICES  
OF THE U.S. HOUSE OF  
REPRESENTATIVES and PERMANENT  
SELECT COMMITTEE ON  
INTELLIGENCE OF THE U.S. HOUSE OF  
REPRESENTATIVES,

Intervenor-Defendants.

Docket No. 1:19-cv-03826-ER

**JOINT STATUS REPORT**

Pursuant to this Court's order of November 29, 2022, the parties submit this status report concerning future proceedings in this case:

**STATEMENT OF PARTIES**

Plaintiffs and Intervenor-Defendants are continuing to engage in negotiations intended to narrow or resolve their disputes. In the last 30 days, the parties (including Deutsche Bank AG, as the custodian of records) continued to work through considerations related to the scope, logistics, and

other factors implicated by the proposal, including circulation of a revised proposed written settlement agreement that has been circulated among the parties. The parties also continued discussions regarding a reasonable period of time needed, following the conclusion of a resolution to this matter, to allow for any further necessary review of materials, consultation among the parties, and other efforts to facilitate the production of responsive information based on the final parameters of any ultimate settlement. Given the current status of these discussions, and the expectation that such discussions and/or compliance with any settlement would necessarily extend into the next session of Congress, all parties agree that an additional 30 days will aid those negotiations and will further allow coordination with Deutsche Bank regarding the implementation and other considerations of any agreed-upon process. To allow additional time for these discussions, the parties respectfully request that the Court set a new date for a status report of January 27, 2022.

Dated: December 28, 2022

s/ Douglas N. Letter

Douglas N. Letter  
Todd B. Tatelman  
Eric. R. Columbus  
Stacie Fahsel  
OFFICE OF GENERAL COUNSEL  
U.S. HOUSE OF REPRESENTATIVES  
5140 O'Neill House Office Bldg.  
Washington, D.C. 20515  
(202) 225-9700  
douglas.letter@mail.house.gov

*Counsel for the Committee on Financial Services and  
Permanent Select Committee on Intelligence of the U.S.  
House of Representatives*

s/ Raphael A. Prober

Raphael A. Prober  
Parvin D. Moyne  
Thomas C. Moyer  
AKIN GUMP STRAUSS HAUSER & FELD LLP  
2001 K Street N.W.  
Washington, D.C. 20006  
(202) 887-4343

*Counsel for Deutsche Bank AG*

Respectfully submitted,

s/ Patrick Strawbridge

Patrick Strawbridge  
CONSOVOY MCCARTHY PLLC  
Ten Post Office Square  
8th Floor South PMB #706  
Boston, MA 02109  
patrick@consovoymccarthy.com

William S. Consovoy  
Cameron T. Norris  
CONSOVOY MCCARTHY PLLC  
3033 Wilson Blvd., Ste. 700  
Arlington, VA 22201  
(703) 243-9423  
will@consovoymccarthy.com  
cam@consovoymccarthy.com

*Counsel for President Donald J. Trump, Donald J. Trump  
Jr., Eric Trump, Ivanka Trump, The Donald J. Trump  
Revocable Trust, The Trump Organization, Inc., Trump  
Organization LLC, DJT Holdings LLC, DJT Holdings  
Managing Member LLC, Trump Acquisition LLC, and  
Trump Acquisition, Corp.*